

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 4:11CR196
	§	(Judge Schell)
ROSEMARIE FLORES (36)	§	
a.k.a. Rosemarie Flores Briosso, "Ericka"	§	

MOTION FOR DETENTION HEARING

COMES NOW the United States and asks this Honorable Court to set the instant case for detention hearing under Title 18, United States Code, §3141, et. seq., and would show the Court the following:

1. The pending case involves:

- ☐ (A) A crime of violence.
- ☐ (B) An offense for which the maximum sentence is life imprisonment or death.
- ☒ (C) An offense for which a maximum term of imprisonment of ten years or more is prescribed in the Controlled Substances Act, the Controlled Substances Import and Export Act or Title 21, U.S.C. §955(a).
- ☐ (D) A felony committed after the Defendant had been convicted of two or more prior offenses described in Title 18, U.S.C. §3142(f)(1)(A)-(C) or comparable state or local offenses.
- ☒ (E) A serious risk that the Defendant will flee.
- ☐ (F) A serious risk that the person will obstruct or attempt to obstruct justice, or attempt to threaten, injure or intimidate a prospective witness or juror.

☐ (G) The person was on release pending trial for a felony under State, Federal or Local law; or was on probation or parole for an offense under State, Federal or Local law.

2. No condition or combination of conditions will:

☒ (A) Reasonably assure the appearance of the person as required.

☒ (B) The safety of the community or any other person.

WHEREFORE, Premises Considered, the Government requests that the Defendant be held without bond.

Respectfully submitted,

JOHN M. BALES
UNITED STATES ATTORNEY

/s/

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing will be served by electronic filing once known.

____/s/_____
HEATHER RATTAN